

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

MST, LLC,

Plaintiff,

v.

North American Land Trust and
Georgetown Memorial Hospital,

Defendants.

Case No. 2:22-cv-874-DCN

**JOINT MOTION FOR
AMENDED
SCHEDULING ORDER**

In November, the Parties engaged a mediator to mediate this case, with a scheduled mediation date in March. Unfortunately, the mediator experienced health issues, and the mediation has thus been rescheduled for April 22, 2024.

To maintain consistency in the scheduling order, the Parties thus jointly move this Court for an Amended Scheduling Order in this case, and they respectfully propose the following amended dates for the deadlines identified in Local Civil Rule 16.02 (D.S.C):

- (1) Filing motions to join parties and to amend pleadings. **May 17, 2024**
- (2) Exchange of expert witness disclosures and filing any related disclosure and certification required by the scheduling order.

Plaintiff Expert Deadline: May 6, 2024

Defendant Expert Deadline: June 6, 2024

Rebuttal Expert Deadline: July 5, 2024

(3) Completion of discovery and filing certification of consultation with client and opposing counsel as to the use of alternative dispute resolution as required by Local Civ. Rule 16.03 (D.S.C.). **August 26, 2024**

(4) Mediation Deadline. **May 6, 2024**

(5) Filing dispositive motions. **September 12, 2024**

(6) Trial to occur on or after **November 1, 2024**.

The parties agree the following deadlines should be set via subsequent pretrial order upon the setting of the trial date by the Court:

(10) Filing and exchanging Fed. R. Civ. P. 26(a)(3) pretrial disclosures.

(11) Filing and exchanging Fed. R. Civ. P. 26(a)(3) objections, any objections to use of a deposition designated by another party, and any deposition counter-designations under Fed. R. Civ. P. 32(a)(4).

(12) Meeting, marking, and exchanging exhibits and completing a final exhibit list with objections noted. See Local Civ. Rule 26.07 (D.S.C.) (instructions relating to exhibits).

(13) Submission of Local Civ. Rule 26.05 (D.S.C.) pretrial brief to the court.

(14) Trial date.

The Parties respectfully request that the Court would adopt the Parties' proposed deadlines and enter an Amended Scheduling Order in this case.

Respectfully submitted,

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